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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MEDARC, LLC, as Collection Agent for Jeffrey
H. Mims, Trustee of the Liquidating Trust of
Revolution Monitoring, LLC, Revolution
Monitoring Management, LLC, and Revolution
Neuromonitoring, LLC,

Plaintiff,

v.

UMR, INC. SUCCESSOR TO
COMMONWEALTH ADMINISTRATORS,
LLC, a Wisconsin limited liability company;
WPS, a Wisconsin corporation; CARE
IMPROVEMENT PLUS GROUP
MANAGEMENT, LLC, a Texas limited
liability company; TRIWEST HEALTHCARE
ALLIANCE CORP., an Arizona corporation;
CULINARY HEALTH FUND
ADMINISTRATIVE SERVICES, LLC, a
Nevada limited liability company;
BOONCHAPMAN BENEFIT
ADMINISTRATORS, INC., a Texas
corporation; HEALTH PLAN OF NEVADA
INC., a Nevada corporation; SIERRA HEALTH
AND LIFE INSURANCE COMPANY, INC., a
Nevada corporation; TEACHERS HEALTH
TRUST, a Nevada corporation; TELLIGEN
INC., an Iowa corporation; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT
HEALTH AND WELFARE TRUST, a Nevada
corporation; SOUTHWEST SERVICE
ADMINISTRATORS INC., a Tennessee
corporation; LOOMIS BENEFITS, INC., a
Nevada corporation; DOES 1-10, inclusive; and
ROE CORPORATIONS 1-10, inclusive,

Defendants.

Case No.: 2:21-cv-00286-GMN-NJK

STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO PLAINTIFF'S COMPLAINT
(FIRST REQUEST)

1 **IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN** MEDARC,
2 LLC, as Collection Agent for Jeffrey H. Mims, Trustee of the Liquidating Trust of Revolution
3 Monitoring, LLC, Revolution Monitoring Management, LLC, and Revolution Neuromonitoring,
4 LLC (“MEDARC”) and Defendant TriWest Healthcare Alliance Corporation (“TriWest”)
5 (together the “Parties”), by and through their undersigned counsel, as follows:

6 1. MEDARC filed its original complaint in the Eighth Judicial District Court, Clark
7 County, Nevada, Case No. A-20-821973-C, on September 25, 2020.

8 2. On February 19, 2021, Defendants UMR, Inc., Car Improvement Plus Group
9 Management, LLC, HealthPlan of Nevada Inc., and Sierra Health and Life Insurance Company,
10 Inc. filed a Notice of Removal to the United States District Court, District of Nevada. [ECF No.
11 1].

12 3. The deadline for TriWest to respond to MEDARC’s Complaint is, by agreement,
13 currently March 12, 2021.

14 4. The Parties have agreed to extend the deadline for TriWest to respond to
15 MEDARC’s Complaint by 28 days. This request is not intended to cause delay or prejudice any
16 party.

17 5. The Parties respectfully request this extension in order to explore early resolution
18 of TriWest’s involvement in the litigation.

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1 **NOW, THEREFORE, IT IS STIPULATED AND AGREED** by and between the
2 Parties that the time for TriWest to respond to MEDARC's Complaint is extended to April 9,
3 2021.

4 DATED this 4th day of March, 2021.

DATED this 4th day of March, 2021.

5 **FOX ROTHSCHILD LLP**

ALDRICH LAW FIRM, LTD.

6
7 /s/ Rex D. Garner

8 MARK J. CONNOT (10010)

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/s/ Catherine Hernandez

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Attorneys for Plaintiff

18 **IT IS SO ORDERED**

19 
20 ~~UNITED STATES DISTRICT JUDGE/~~
21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** March 5, 2021